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Attorneys for Defendant

Rutgers, The State University of New Jersey

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

K.L., Plaintiff,

v.

RUTGERS, THE STATE UNIVERSITY OF
NEW JERSEY, MARQUES FORD, JOHN
BOWERS, ABC, INC. 1-10 (Fictitious
Entities), and JOHN DOES 1-20 (Fictitious
Entities and/or Persons), Defendants,

and

JOHN BOWERS, Third-Party Plaintiff,

v.

CELENE LUSCHER, Third-Party Defendant.

Case No. 3:16-cv-9270-MAS-LHG

**DEFENDANT RUTGERS,
THE STATE UNIVERSITY OF NEW
JERSEY'S NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

Oral Argument Requested

Return Date: March 16, 2020

Document Filed Electronically

TO: Jeffrey P. Fritz, Esq.
Soloff & Zervanos, PC
1525 Locust Street, 8th Floor
Philadelphia, PA 19102
Attorneys for Plaintiff, K.L.

PLEASE TAKE NOTICE that on **March 16, 2020, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, Defendant Rutgers, The State University of New Jersey ("Rutgers"), by its attorneys Saiber LLC, shall move before the Honorable Michael A. Shipp, U.S.D.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order granting summary

judgment in favor of Rutgers on all counts contained in Plaintiff K.L.'s Amended Complaint that are directed to Rutgers (Counts I through V) pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Rutgers shall rely upon its Local Civil Rule 56.1 Statement of Undisputed Material Facts, its Brief, the Declarations of William F. Maderer, Esq., Amy Miele, Jordan Shyi, Jackie Moran, Will Gilkison, and Joseph Ray, and Reply papers submitted, if any.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Rutgers hereby requests oral argument pursuant to Local Civil Rule 78.1(b)(1).

Respectfully submitted,

SAIBER LLC
Attorneys for Defendant
Rutgers, The State University of New Jersey

By: *s/ William F. Maderer*
William F. Maderer
Ryan E. San George

Dated: February 21, 2020